

COVER LETTER FOR FILING OF MOTION TO AMEND AND ADDITIONAL EXHIBITS

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

GEOFFREY FERNALD,
Plaintiff,

v. Case No.: **1:25-cv-00294**

OPENAI, INC.,
Defendant.

TO THE CLERK OF COURT:

Geoffrey Fernald, Pro Se Plaintiff, respectfully submits the following documents for filing in the above-captioned matter:

FILING PACKAGE CONTENTS

PRIMARY MOTIONS:

- 1. Motion to Amend Complaint and Admit Additional Exhibits A1.0 Through A1.6**
 - Requests court permission to include critical new evidence
 - Documents systematic AI privacy violations affecting millions of users
- 2. Motion for Sealing of Exhibit A1.5 and Partial Sealing of Exhibit A1.7**
 - Protects sensitive medical information and witness personal details
 - Maintains public access to AI safety evidence

SUPPORTING EVIDENCE:

3. Affidavit of Elizabeth Upshaw

- Independent witness authentication of video evidence
- Documents cross-account privacy violations in Colorado

EXHIBITS A1.0 THROUGH A1.6:

4. **Exhibit A1.0:** Master Timeline & Case Overview
5. **Exhibit A1.1:** Original Intent vs System Deviation Analysis
6. **Exhibit A1.2:** Termination Failure Evidence
7. **Exhibit A1.3:** System Admissions and Self-Incriminating Statements
8. **Exhibit A1.4:** Psychological Harm Timeline
9. **Exhibit A1.5:** Ongoing Legal Violations Summary
10. **Exhibit A1.6:** Independent Witness Cross-Account Identity Breach

FILING INSTRUCTIONS

PUBLIC FILING REQUESTED:

- Motion to Amend Complaint
- Exhibits A1.0, A1.1, A1.2, A1.3, A1.5, A1.6 (with partial sealing for personal info only)
- Elizabeth Upshaw Affidavit (with personal contact information redacted)

SEALING REQUESTED:

- **Complete Sealing:** Exhibit A1.4 (sensitive medical information)
- **Partial Sealing:** Personal contact information in Exhibit A1.6 only

EXPEDITED CONSIDERATION REQUESTED:

Due to evidence of ongoing systematic privacy violations affecting millions of ChatGPT users and immediate threats to public safety requiring urgent judicial and regulatory attention.

CASE SIGNIFICANCE

This filing presents evidence that transforms an individual AI user complaint into proof of systematic privacy and security failures affecting millions of users nationwide. The independent witness video evidence demonstrates cross-account privacy violations that pose immediate threats to public safety and require urgent judicial intervention.

SERVICE OF PROCESS

Copies of all documents will be served on Defendant OpenAI, Inc. via certified mail to their registered address at 3180 18th St, San Francisco, CA 94110, and electronically if permitted by court rules.

CONTACT INFORMATION

Plaintiff Contact: Geoffrey Fernald

19 Transit St
Woonsocket, Rhode Island 02895
Phone: (401) 263-5360
Email: nrivikings8@gmail.com

Available for questions or clarification regarding this filing.

FILING FEES

Please advise if any filing fees are required for the Motion to Amend or additional exhibits. Plaintiff is prepared to pay all required fees upon notification.

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with all applicable Local Rules of the United States District Court for the District of Rhode Island and the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ Geoffrey Fernald
Geoffrey Fernald
Pro Se Plaintiff

Date: June 26, 2025
